

**From:** [Trina Realmuto](#)  
**To:** [Larakers, Mary L. \(CIV\)](#); [Seamon, Matthew \(CIV\)](#); [Iqbal, Aysha T. \(CIV\)](#); [Cappelletti, Daniel \(CIV\)](#); [Perez, Elianis \(CIV\)](#); [Sauter, Mark \(USAMA\)](#)  
**Cc:** [Matt Adams](#); [Kristin Macleod-Ball](#); [Mary Kenney](#); [hughesa@humanrightsfirst.org](mailto:hughesa@humanrightsfirst.org)  
**Subject:** Potential Meet and Confer - DVD v DHS  
**Date:** Monday, March 31, 2025 4:10:00 PM  
**Attachments:** [image002.png](#)

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Counsel,

A few hours ago, Secretary of State Rubio reposted a tweet from Nayib Bukele indicating that 17 individuals were transferred from U.S custody to El Salvador. See <https://x.com/SecRubio>. This followed a post from Secretary Rubio to similar effect on the same platform (<https://x.com/SecRubio/status/1906684174020284784>). The State Department has also posted an announcement on its website titled "More Foreign Gang Terrorists Deported Out of America" (see <https://www.state.gov/more-foreign-gang-terrorists-deported-out-of-america/>).

Were all of these 17 people Salvadoran nationals, and if not, can you please provide more information, specifically whether any of them had final removal orders?

In addition, can you confirm that no one is currently being removed pursuant to the March 30, 2025 Guidance?

If any non-Salvadorans among the 17 individuals described in Secretary Rubio's statements had final removal orders, or if noncitizens are being subjected to removal under the Guidance, that would violate the TRO, and we immediately request a meet and confer.

We look forward to hearing back from you soon.

Trina



**From:** [Larakers, Mary L. \(CIV\)](#)  
**To:** [Trina Realmuto](#)  
**Cc:** [Seamon, Matthew \(CIV\)](#); [Iqbal, Aysha T. \(CIV\)](#); [Cappelletti, Daniel \(CIV\)](#); [Perez, Elianis \(CIV\)](#); [Sauter, Mark \(USAMA\)](#); [matt@nwirp.org](mailto:matt@nwirp.org); [Kristin Macleod-Ball](#); [Mary Kenney](#); [hughesa@humanrightsfirst.org](mailto:hughesa@humanrightsfirst.org)  
**Subject:** Re: [EXTERNAL] Potential Meet and Confer - DVD v DHS  
**Date:** Monday, March 31, 2025 4:19:13 PM  
**Attachments:** [image002.png](#)

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Hi Trina,

Received. I am looking into this.

Thanks,  
Mary

**From:** [Matt Adams](#)  
**To:** [Larakers, Mary L. \(CIV\)](#)  
**Cc:** [Trina Realmuto](#); [Seamon, Matthew \(CIV\)](#); [Iqbal, Aysha T. \(CIV\)](#); [Cappelletti, Daniel \(CIV\)](#); [Perez, Elianis \(CIV\)](#); [Sauter, Mark \(USAMA\)](#); [Kristin Macleod-Ball](#); [Mary Kenney](#); [hughesa@humanrightsfirst.org](mailto:hughesa@humanrightsfirst.org)  
**Subject:** Re: [EXTERNAL] Potential Meet and Confer - DVD v DHS  
**Date:** Tuesday, April 1, 2025 4:48:22 PM

Good afternoon Mary,

I am writing to follow up regarding our inquiry as we have received information that at least one of the 17 individuals referred to by Secretary Rubio had a final order and was not a Salvadoran national.

Specifically, [REDACTED]. A# [REDACTED]. His family and counsel have reported that Mr. [REDACTED] was first moved to Guantanamo the night of March 28, well after the district court entered its order in this case, and then removed to El Salvador, as Secretary Rubio reported, late in the night of March 30.

Can you please advise whether Defendants acknowledge his removal was in violation of the district court? If Defendants believe his removal did not violate the TRO, can you please advise if any of the information we have communicated in this email regarding Mr. [REDACTED] is not correct or any other basis for asserting this does not violate the TRO?

In addition, we continue to wait for your responses regarding the other 16 individuals as well as confirmation that no one is currently being removed pursuant to the March 30, 2025 Guidance submitted by Defendants in this case.

Thank you for your prompt attention in this important matter. We look forward to following up with you and discussing next steps.

Matt

**From:** [Larakers, Mary L. \(CIV\)](#)  
**To:** [matt@nwirp.org](mailto:matt@nwirp.org)  
**Cc:** [Trina Realmuto](#); [Seamon, Matthew \(CIV\)](#); [Iqbal, Aysha T. \(CIV\)](#); [Cappelletti, Daniel \(CIV\)](#); [Perez, Elianis \(CIV\)](#); [Sauter, Mark \(USAMA\)](#); [Kristin Macleod-Ball](#); [Mary Kenney](#); [hughesa@humanrightsfirst.org](mailto:hughesa@humanrightsfirst.org)  
**Subject:** RE: [EXTERNAL] Potential Meet and Confer - DVD v DHS  
**Date:** Wednesday, April 2, 2025 7:35:06 PM

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Good evening Matt,

I have no information to share at this time.

Best,  
Mary

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